

UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

IN RE:

David A Jerri, Sr.	:	Case No.: 20-11263-amc
Debtor	:	Chapter 13

MOTION TO MODIFY PLAN AFTER CONFIRMATION

The Debtor, David A. Jerri, Sr., by and through his undersigned counsel, hereby move to modify his Chapter 13 Plan and in support thereof aver as follows:

1. Debtor filed a Chapter 13 Bankruptcy on or about February 28, 2020.
2. The Chapter 13 filing was assigned case number 20-11263.
3. The Chapter 13 Plan was confirmed by this Honorable Court on or about September 1, 2020.
4. On or about January 12, 2021 the Debtor and Wilmington Savings Fund Society, FSB et al, entered into a Stipulation resolving the pending Motion for Relief.
5. Per the Stipulation, the Debtor is delinquent in the sum of \$6,153.20 in post-petition payments. A true and correct copy of the Stipulation is attached hereto as **Exhibit "A."**
6. The Debtor fell behind in his payments to the creditor due to Debtor's misunderstanding of his responsibilities moving forward surrounding the Motion for Relief that was filed by Wilmington Savings Bank.
7. Debtors' counsel has since clarified his misunderstanding and the Debtor is ready and willing to make regular and timely payments to the creditor moving forward.

8. In accordance with the Stipulation, the Debtor will cure the subject \$6,153.20 by amending the Chapter 13 plan.

9. In furtherance of the Stipulation and the Debtor curing the post-petition delinquency, this Motion and Modified Chapter 13 Plan are being contemporaneously filed.

10. The Debtor's proposed modified Chapter 13 Plan, attached hereto as "Exhibit B", is affordable to the Debtor.

WHEREFORE, the Debtor requests that he be permitted to modify his Chapter 13 Plan for the above-stated reasons.

Dated: January 15, 2021

/s/Brad J. Sadek, Esq.
Brad J. Sadek, Esq.
Attorney for Debtor
1315 Walnut Street
Suite #502
Philadelphia, PA 19107